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Defendants

**HIDDEN EMPIRE HOLDINGS, LLC,
HYPER ENGINE, LLC, AND DEON
TAYLOR;**
And Third-Party Defendant
ROXANNE TAYLOR

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

HIDDEN EMPIRE HOLDINGS,
LLC; a Delaware limited liability
company; HYPER ENGINE, LLC; a
California limited liability company;
DEON TAYLOR, an individual,

Plaintiffs,

vs.

DARRICK ANGELONE, an
individual; AONE CREATIVE LLC,
formerly known as AONEE
ENTERTAINMENT LLC, a Florida
limited liability company; and ON
CHAIN INNOVATIONS LLC, a
Florida limited liability company,

Defendants.

DARRICK ANGELONE, an
individual; AONE CREATIVE LLC,

Case No. 2:22-cv-06515-MWF-AGR

The Hon. Michael W. Fitzgerald

**DECLARATION OF DEON TAYLOR
IN SUPPORT OF PLAINTIFFS'
MOTION FOR SUMMARY
JUDGMENT**

HEARING:

DATE: July 7, 2025

TIME: 10:00 a.m.

LOCATION: Courtroom 5A



1 formerly known as AONE
2 ENTERTAINMENT LLC, a Florida
3 limited liability company; ON
4 CHAIN INNOVATIONS LLC, a
5 Florida limited liability company

6
7 Counterclaimants,

8
9 HIDDEN EMPIRE HOLDINGS,
10 LLC; a Delaware limited liability
11 company; HYPERENGINE, LLC; a
12 California limited liability company,
13 DEON TAYLOR, an individual,

14
15 Counterclaim
16 Defendants,

17
18 DARRICK ANGELONE, an
19 individual; AONE CREATIVE LLC,
20 formerly known as AONE
21 ENTERTAINMENT LLC, a Florida
22 limited liability company; ON
23 CHAIN INNOVATIONS LLC, a
24 Florida limited liability company,

25
26 Third-Party Plaintiffs

27
28 v.

29
30 ROXANNE TAYLOR, an
31 individual, Third-Party Defendant

DECLARATION OF DEON TAYLOR

I, Deon Taylor, declare as follows:

1. I am the co-founder, managing member and co-Chief Executive Officer of Hidden Empire Holdings, LLC ("HEFG"), which was founded in Southern California in 2012.. My wife, Roxanne Avent Taylor, is the other co-founder, managing member and co-Chief Executive Officer of HEFG. HEFG is a successful independent film company that has produced numerous films that have been distributed nationally and internationally including, but not limited to, "Fatale," a psychological thriller starring two-time Academy Award winner Hillary Swank and Michael Ealy, "Black and Blue," an action thriller starring Academy Award nominee Naomie Harris, Tyrese Gibson and Frank Grillo, "Intruder," a psychological thriller starring Dennis Quaid, Michael Ealy and Meghan Good, "Traffik," a thriller starring Omar Epps and Paula Patton, "Meet the Blacks," a comedy-horror starring Mike Epps, Bresha Webb and Katt Williams, "The House Next Door: Meet the Blacks 2," a comedy-horror starring Mike Epps, Katt Williams and Lil Duval, and "Supremacy," a thriller starring Joe Anderson, Danny Glover and Derek Luke. HEFG has also produced the film titled "Fear," a horror starring Joseph Sikora, Andrew Bachelor and Anne Ilonzeh, which will be distributed. I served as a writer and/or director on all of HEFG's films. HEFG also produces "Black History in Two Minutes," a series of brief episodes about the African-American experience narrated by Henry Louis Gates, Jr. and published on YouTube and Facebook. HEFG also has initiatives called BeWoke.Vote which aims to encourage younger generations to vote and become educated about politics, Together We Will Save Lives, where we partner with the Conference of National Black Churches in philanthropic endeavors, and the "Black Chair Show," where I interview other celebrities to share empowerment messages. HEFG also runs the CLIMB Organization, a non-profit that mentors inner-city youth to help them excel



1 and pursue their dreams. HEFG's website address is: hiddenempirefilmgroup.com.
2 My duties at HEFG include executive management of all operations of HEFG
3 including, but not limited to, all creative and marketing operations.

4 2. The facts set forth in this declaration are based on my personal
5 knowledge, except where otherwise noted, and, if called to testify, I could and
6 would competently testify thereto.

7 3. I am also the founder of Hyper Engine, LLC ("Hyper Engine"), a
8 marketing and branding agency that specializes in reaching diverse audiences. My
9 wife Roxanne manages its day-to-day operations. Hyper Engine serves as the
10 marketing agency for HEFG as well as its films and initiatives. HEFG and Hyper
11 Engine hold all the rights to prosecute the intellectual property claims discussed in
12 this declaration.

13 4. AOne Creative LLC, formerly AOne Entertainment LLC ("AOne")
14 has provided a variety of services to HEFG and its films and initiatives and for me
15 personally since 2012. The types of services it provided have included the
16 following: hosting the domains of HEFG and Hyper Engine and making sure the
17 domain registrations are current; design, development and maintenance of the
18 HEFG and Hyper Engine websites; maintaining and renewing the registrations for
19 the HEFG Google workspace accounts used for HEFG emails, contacts, calendars,
20 etc.; maintaining the servers that host the HEFG websites; creating social profiles
21 for, posting content on and managing the social media accounts (Instagram,
22 Facebook, Twitter, LinkedIn) of HEFG, the HEFG initiatives and the personal
23 accounts of certain HEFG personnel; publishing Hyper Engine content on
24 YouTube and Facebook; copywriting; managing paid media campaigns; and
25 handling digital marketing campaigns for HEFG films.
26

27 5. Darrick Angelone is the founder and owner of AOne.

28 6. By virtue of the types of services AOne provided, it has been in



1 possession of the username and password credentials for all of the domain,
2 GoDaddy, Google Workspace, website and social media accounts owned by
3 HEFG, Hyper Engine and/or myself (the “Credentials”).

4 7. In or about July 2022, the HEFG team including but not limited to
5 Roxanne and its COO, Quincy Newell, asked Mr. Angelone to provide the
6 Credentials to HEFG. Mr. Angelone has refused to provide the credentials to
7 HEFG.

8 8. On or about August 7, 2022, I noticed that Mr. Angelone had locked
9 out HEFG and all of its personnel from being able to access the HEFG emails. In
10 other words, neither I nor any of the other HEFG personnel could send emails or
11 see the emails that were received. This has been extremely disruptive to HEFG’s
12 ability to conduct business. My HEFG team and I access information about HEFG
13 accounts (eg, bank accounts), contracts, the status of HEFG projects and many
14 other matters in our Google Account and circulate those materials through email. I
15 made numerous efforts to try to get Mr. Angelone’s cooperation to give HEFG
16 access to its emails and other accounts.

17 9. For example, on August 11, 2022, I sent an email to Mr. Angelone and
18 his attorneys Mr. Fox and Mr. Thompson about the fact that Mr. Angelone locked
19 out HEFG and its personnel from its email, social media and website accounts. A
20 true and correct copy of said email is attached hereto as **Exhibit 19**.

21 10. Neither I, nor any other HEFG personnel, has given Mr. Angelone or
22 any other AOne personnel, authorization to review our HEFG emails. However, on
23 August 22, 2022, Mr. Angelone sent a series of texts to me evidencing that he had
24 been reviewing HEFG emails going back several years. Embedded in one of those
25 texts was a Business Debit Card Enrollment Form from Bank of the West that my
26 wife Roxanne filled out in September 2019 and emailed back to Bank of the West
27 from her HEFG email account. A true and correct copy of an excerpt from said
28



1 text and the related form is attached hereto as **Exhibit 20**.

2 11. Mr. Angelone's series of texts on that day also included private emails
3 between Roxanne and HEFG's accountants. A true and correct copy of said text
4 excerpt and the related emails are attached hereto collectively as **Exhibit 21**.

5 12. The fact that Mr. Angelone sent Exhibits 20 and 21 to me evidences
6 that Mr. Angelone had looked through Roxanne's personal HEFG emails and found
7 that form which he sent to me. Acknowledging that he had been looking through
8 our private emails, Mr. Angelone stated in his series of text messages that: "Until
9 this deep dive I had not noticed how badly I was being gaslighted." A true and
10 correct copy of said text excerpt is attached hereto as **Exhibit 22**. The "deep dive"
11 Mr. Angelone references was his looking through years worth of my and Roxanne's
12 private emails without our authorization.

13 13. In that same series of text messages Mr. Angelone sent me a
14 confidential and privileged draft of an operating agreement for Hyper Engine that
15 was sent from our outside counsel to me and Roxanne by email to our HEFG email
16 accounts. Mr. Angelone did not have authorization to either look through HEFG
17 emails or access any privileged information. A true and correct copy of said text
18 excerpt is attached hereto as **Exhibit 23**.

19
20
21 I declare under the penalty of perjury under the laws of the United States of
22 America that the foregoing is true and correct.

23 Executed on June 9, 2025 at Los Angeles, California

24
25 /s/ Deon Taylor
26 Deon Taylor
27
28



EXHIBIT 19

On Aug 11, 2022, at 1:21 PM, Jt Fox <jt@jtfowlaw.com> wrote:

I am free tomorrow.

JT Fox, Esq.

LAW OFFICES OF J.T. FOX and ASSOCIATES, APC

556 S. Fair Oaks Ave., Suite 444

Pasadena, Ca 91105

(888) 750-5530 Work

(888) 750-5530 Fax

WWW.JTFOXLA.W.COM

Email: jt@jtfowlaw.com

On Aug 11, 2022, at 11:58 AM, Deon Taylor <deontaylor@icloud.com> wrote:

Darrick , MR JT , Darrell

I'm sending this note this am - In a effort to ask for timing on this matter — I have reached out via cell - to Darrick a few times to speak - Mr JT, Darrell , we have reached out to both of you as well- we have heard back from no one !

Today is the 4th day , since you all have Shut off my company emails completely - After we paid in full the balance of all invoices for social services and social management to Aone and Darrick—Yesterday we learned , I lost a project assignment / via no response / - simply because we have no access to our personal emails (huge blow and costly) — this note is not about that at this time , although this needs to be dealt with in the future... This note is to put everyone on Notice above that - I have asked numerous times to please activate our emails - and too simply return our social media accounts , that are personal !! I've also adhered to Darrick's request originally to speak to Darrell to resolve this matter

— we did this as well, and nothing transpired.. I've said numerous times that we are open to figuring things out- As we have been for months — although we have not reached a agreement - we have continued to all work and build and move forward —there is absolutely no reason that our emails , and socials should be disconnected and shut off and held by anyone that is not us.. I've asked a few times , why are our emails deactivated ?? there is no response , except "we was suppose to have done a deal for a marketing company" which is a completely different entity then my production company that you have hurt tremendously Over the last few days ! Not to mention the marketing company is something i have been willing discuss and build for a while with our group and you together -we spoke to your attorney about this already. - this deal does not constitute you shutting off are emails and changing all passcodes to our flag ship company and all existing film IPs we own--- not to mention , accounts we have set up for Darrick to mange and be paid for, which you have been paid in full on!

At this point - I'm writing this because there is a extremely large issue looming and A major presence that is aware of these actions taken by you all, And this presence , Has its own methods to resolving this matter - At this very moment , I have asked Darrick personally to call me this morning — In a effort as busneiss men to stop what will happen in the next few hours if we cant simply get a plan of resolve and a way to move forward... I truly don't want this to become catastrophic -And I'm sure you guys don't either - a large part of this is about keeping reputations and integrity in place as we work in a very small market! - so I'm fighting to keep that in tow and keep some spirit around going forward and figuring this out - As we are all wondering what is happening / and why are we doing this... when the agreement we came up with your attorney was to pay all outstanding invoices and then socials would be returned - and we would sit down and build this out. After your request to pay all invoices was met ! We did this - and here we are !

We have had no response, from anyone in days - Mr JT, Darrell , after several attempts beginning a few days ago, you both remain absent -You all are aware we have no access to our own busneiss accounts / log ins to banking info , contracts , agreements , employee emails nothing! This has cost us tremendously..... I'm asking you both this am - to please call Quincy and tell us the method to resolve!! — the actions that have been taken against us For no reason other than being upset!! Is unethical - it's also unethical that both attorneys will not call back- what has been done is nothing short of AWFUL !! - no matter who or what company purchased the server - the spirit of the purchase was for the client.. which is included in the invoices - for years - we have sent text and calls on what to grab, purchase or search for when we need a social - or a URL.

being upset over a deal or simply being mad because the deal has not taken priority is always understandable - I have recently closed a deal with someone I personally waited close to 11 years to execute-I say this to say — there is NO GROUNDS FOR WHAT HAS TRANSPIRED!!

I'm still asking why ? Why this method ? - I'm sending this email only because , we would like to solve this matter and receive our things back and continue to be open to working with Darrick going forward — But I am afraid that if we can't get this done now - myself and the entire team you are speaking with

will be removed completely from all matters by the close of busneiss today - And there will be a different entity dealing with this at the highest level and beyond - I'm am trying to not have this happen . This is my final effort -

Please note , I tried to call Darrick 3 times this AM in effort to speak about, what's needed to resolve this matter-

JT, Quincy has also called you twice this am -

Fc312098.

Sent from my iPhone

DEON TAYLOR

HIDDEN EMPIRE FILM GROUP

GOD WORKS ..

Passion beats Talent -

On Aug 9, 2022, at 1:14 PM, darrick@aons.la wrote:

Adding JT Fox esq. who will be representing AOne and with whom Quincy can work with to formalize the Hyper Engine agreement and discuss all other related matters with. Thank you.

Warm regards,

Darrick Angelone

AOne Creative LLC.

a: 323.205.6506 | m: 310.869.2354

607343

EXHIBIT 20

You and roxanne set up bank accounts and cards in my name for hyper engine... and never told me.

Filed operating agreement with california sos for hyoer engine listing me as a partner....

https://www.dropbox.com/s/28uuryl5s2mq0uk/9.11.19%20hyper%20engine%20operating%20agreement%20Fwd_%20Hyper%20Engine.pdf?dl=0

<https://www.dropbox.com/s/pa1wb9btb8m4goa/Hyper%20Engine%20Operating%20Agreement%20%20LLC.pdf?dl=0>

Until this deep dive i had not noticed how badly i was being gaslighted



BUSINESS DEBIT CARD ENROLLMENT

(This is not a credit card)

TELL US ABOUT YOUR COMPANY (PLEASE PRINT)

Business Name

H Y P E R E N G I N E L L C

Primary Business or Commercial Checking Account Number

Phone Number (916) 257-2475

Tax ID Number

Business Address 8060 SHELBORNE DR

City GRANITE BAY

State CA

Zip 95746

(Street Address Only)

Legal Status

☐

Sole Proprietorship

☐

Partnership

☐

Corporation

☒

LLC

☐

Other

Type of Business MOVIE PRODUCTION

Executed as an agreement on (date) 9-20-19

(Note: Authorized Representative are persons authorized to contract for the business. Authorized Representatives are required to sign this Enrollment Form)

X

Authorized Representative

ROXANNE TAYLOR

Authorized Representative (Please print name.)

X

Authorized Representative

Authorized Representative (Please print name.)

Social Security Number

Social Security Number

Preset Limit A B C D E

(Circle one)

Preset Limit A B C D E

(Circle one)

PRESET DAILY LIMITS	A	B	C	D	E
ATM Cash Limit	\$100	\$0	\$100	\$500	\$995
POS (Combined Signature and PIN)	\$1,200	\$1,200	\$2,000	\$3,000	\$7,000
Number of Transactions	30	30	30	30	30
Limit All Transactions	\$1,300	\$1,200	\$2,100	\$3,500	\$7,995

TELL US ABOUT ADDITIONAL AUTHORIZED CARDHOLDERS (PLEASE PRINT)

D A R R I C K A N G E L D N E

Name of Card User (please print)

Social Security Number Preset Limit A B C D E (circle one)

Name of Card User (please print)

Social Security Number Preset Limit A B C D E (circle one)

Name of Card User (please print)

Social Security Number Preset Limit A B C D E (circle one)

BANK USE ONLY

Employee Name/Number

Cost Center #

Ordered By

Page of (for multiple Authorized Reps)

EXHIBIT 21

You and roxanne set up bank accounts and cards in my name for hyper engine... and never told me.

Filed operating agreement with california sos for hyoer engine listing me as a partner....

https://www.dropbox.com/s/28uuryl5s2mq0uk/9.11.19%20hyper%20engine%20operating%20agreement%20Fwd_%20Hyper%20Engine.pdf?dl=0

<https://www.dropbox.com/s/pa1wb9btb8m4goa/Hyper%20Engine%20Operating%20Agreement%20%20LLC.pdf?dl=0>

Until this deep dive i had not noticed how badly i was being gaslighted

----- Forwarded message -----

From: **Velma** <velma@hiddenempirefilmgroup.com>

Date: Wed, Sep 11, 2019 at 15:24

Subject: Re: Hyper Engine

To: Roxanne Taylor <roxanneavent@gmail.com>

CC: Dorothea Silva <dorothea@avauntltd.com>, Perry Ghilarducci <perryg@avauntltd.com>, Sarah Chen <sarah@avauntltd.com>

Good afternoon Dorothea, please find attached a copy of the Federal Tax I.D. and Operating Agreement for Hyper Engine, LLC. Please let me know what else is needed to proceed. Thank you.

Velma Sykes
Business Affairs
Hidden Empire Film Group
(916) 271-2286
www.hiddenempirefilmgroup.com



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On Wed, Sep 11, 2019 at 2:45 PM Roxanne Taylor <roxanneavent@gmail.com> wrote:

Thank you. Adding Velma to assist. We can use Hefg to pay for now.

There has been no activity to date or bank account

Roxanne Taylor
916.257.2475

> On Sep 11, 2019, at 2:10 PM, Dorothea Silva <dorothea@avauntltd.com> wrote:

>

> Roxanne - It looks like it was suspended by the Franchise Tax Board.

>

> The entity was formed in March 2018 so a 800 FTB fee was due July 15, 2018 and a 2018

return was to be filed or an extension. We did not have this entity on our list for filing so an extension was not prepared.

>

> We can pay the annual tax online. Please let us know what account to pay from.

>

> We will need the EIN # and will need accounting to file a 2018 return. If no activity, please forward on operating agreements and financing agreements. This return is past due since the extension was not filed.

>

> Thanks,

>

> Dorothea Silva, CPA

> 916-641-6990 ext 20

>

> -----Original Message-----

> From: Roxanne Taylor <roxanneavent@gmail.com>

> Sent: Wednesday, September 11, 2019 1:40 PM

> To: Dorothea Silva <dorothea@avauntltd.com>; Perry Ghilarducci
<perryg@avauntltd.com>

> Subject: Hyper Engine

>

> Hey guys

>

> Hyper Engine is saying suspended. Can you find out what is needed on this. I am trying to close a deal and they just looked it up and are holding until rectified.

>

> Thank you

>

> Roxanne Taylor

> 916.257.2475

>

>

EXHIBIT 22

You and roxanne set up bank accounts and cards in my name for hyper engine... and never told me.

Filed operating agreement with california sos for hyoer engine listing me as a partner....

https://www.dropbox.com/s/28uuryl5s2mq0uk/9.11.19%20hyper%20engine%20operating%20agreement%20Fwd_%20Hyper%20Engine.pdf?dl=0

<https://www.dropbox.com/s/pa1wb9btb8m4goa/Hyper%20Engine%20Operating%20Agreement%20%20LLC.pdf?dl=0>

Until this deep dive i had not noticed how badly i was being gaslighted

EXHIBIT 23

From: Deon Taylor <deontaylor@me.com>

Sent: Monday, August 22, 2022 2:04 PM

To: Lawrence Hinkle <lhinkle@sandersroberts.com>

Cc: ROXANNE NEW EMAIL <ROXANNEAVENT@gmail.com>; Personal <quincy.newell@gmail.com>;
Stephanie Jones Nojima <sjonesnojima@sandersroberts.com>

Subject: Re: HEFG/AOne Agreement

2:03

5G+

1430

Darrick Angione

paying until they felt like it. You gaslighted me for 6 years to build a marketing company that quincy can claim i have no interest in.

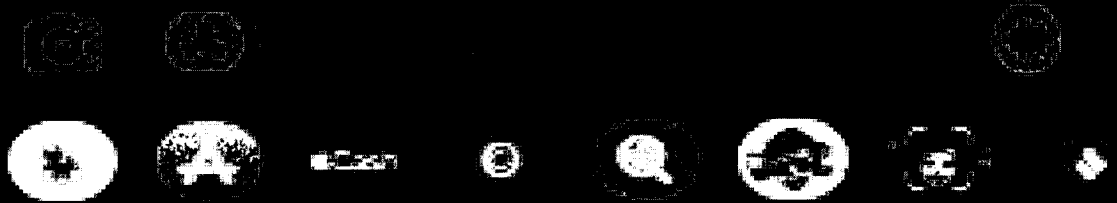
I spent the last 4 days compiling 80 pages with 1400 attached documents detailing my interest in hyper engine and the continued stonewalling by hefg.

You cant demand whats not yours, i am happy to deal with Robert's people as i always have to facilitate a transfer.

Same with any other ip we may have that may belong to a client thats not hefg.

This is the opportunity to talk, with the lawyers on. Never was there terms to transfer any assets before a deal was finalized. We are def filing a lawsuit, the record shows aone consistently performing. And

there is no shadow we worry being uncovered as we always acted with integrity.



2:03

5G+

1430



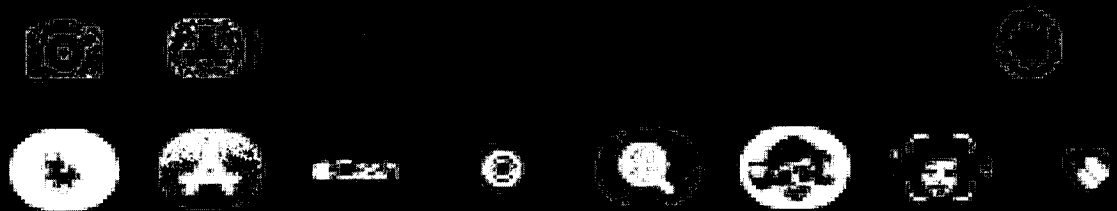
Darriek Angleton

I dont want to talk D. I want it on paper . There is partnership paperwork back to 2018 with my name all over it... i executed projects as an executive of a company never actually formalized.. you talk about taking food from family plate.. you and roxanne have done that since the day i met you. Ive carried cost and services for years with hefg not paying until they felt like it. You gaslighted me for 6 years to build a marketing company that quincy can claim i have no interest in.

I spent the last 4 days compiling 80 pages with 1400 attached documents detailing my interest in hyper engine and the continued stonewalling by hefg.

You cant demand whats not yours, i am happy to deal with Robert's people as i always have to facilitate a transfer.

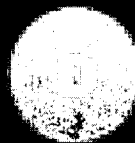
Same with any other ip we may have that may belong to a client



2:02

5G+

1430



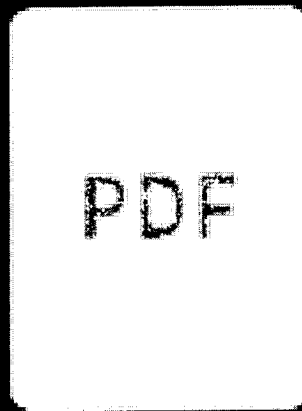
Darrick angleone

Hyper Engine Operating

Agreement LLC.pdf

dropbox.com

Until this deep dive i had not
noticed how badly i was being
gaslighted

**2019 11 25 Taylor Hyper
Engine Operating
Agreement.pdf**

dropbox.com

We don't have to talk, but I'm
directing JT to file a lawsuit with n
the matter this week if discussions
on how to remedy are not started.

